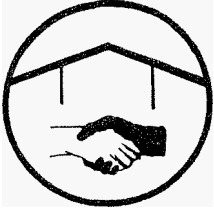


# SOUTHERN RESEARCH & DEVELOPMENT CORP.

3602 OLD JEANERETTE ROAD  
NEW IBERIA, LOUISIANA 70563  
PHONE (337) 367-3277



SR. HELEN VINTON  
PRESIDENT

March 25<sup>th</sup>, 2004

Docket No. R-1181  
Jennifer J. Johnson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution, NW  
Washington D.C. 20551

Dear Ms. Johnson:

We are writing against the proposed change to rules governing the Community Reinvestment Act (CRA). In particular, we are opposed to changing the definition of a “small bank” from a bank with assets of 250 million dollars to a bank having assets of 500 million dollars. The proposed rule would adversely impact the rural communities in which we work by removing incentives for local, community banks to invest in the future prosperity and health of the communities that they serve.

Instead, we urge you to maintain the current “small bank” definition so that local, smaller banks are provided with the same incentives for community investment as larger banks. This is especially important for rural communities, since many larger national banks do not serve, and do not invest, in rural areas. In addition, we encourage federal bank and thrift agencies to institute a comprehensive predatory lending policy to protect the assets of all families, whether rural or urban. Banks should be provided with a disincentive to engage in predatory practices by insuring that abusive lending count against an institution’s CRA rating.

Sincerely,

A handwritten signature in cursive script that reads "Helen Vinton".

Sister Helen Vinton  
President